

1 KEVIN V. RYAN (CABN 118321)  
2 United States Attorney  
3 Attorney for Plaintiff  
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**FILED**

APR 6 - 2005

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 TIMOTHY RONALD OBERT,

16 Defendant.  
17  
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No. CR 04-20107 RMW

VIOLATION:

Ct. 1: Title 18, United States Code,  
Section 2423(c) - Traveling in foreign  
commerce and engaging in any illicit sexual  
conduct with another person;  
Ct. 2: Title 18, United States Code Sections  
2243(a) & 7(9)(B) - Sexual abuse of a minor

SAN JOSE VENUE

19 SECOND SUPERSEDING INDICTMENT  
20

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. § 2423(c))

23 From in or about September, 2001, and continuing through on or about July 6, 2003 in the  
24 Northern District of California, and elsewhere, the defendant

25 TIMOTHY RONALD OBERT,

26 a United States citizen, did travel in foreign commerce to Costa Rica in or about September of  
27 2001 to work as a Peace Corps Volunteer; and, on or about July 6, 2003, while in Costa Rica  
28 during his term as a Peace Corps Volunteer, the defendant did knowingly and intentionally

SECOND SUPERSEDING INDICTMENT

engage in illicit sexual conduct with a Costa Rican minor, where the term "illicit sexual conduct" is defined in 18 U.S.C. Section 2423(f)(1) and Section 2423(f)(2), in violation of Title 18, United States Code, Section 2423(c).

COUNT TWO: (18 U.S.C. §§ 2243(a) & 7(9)(B))

On or about July 6, 2003, in Costa Rica, within the special maritime and territorial jurisdiction of the United States, the defendant

TIMOTHY RONALD OBERT,

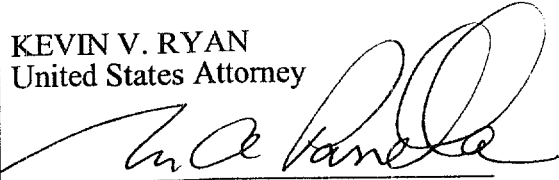
a United States citizen, did knowingly engage in a sexual act with a Costa Rican minor who had attained the age of 12 years but had not attained the age of 16 years and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a) and 7(9)(B).

DATED: 4-6-05

A TRUE BILL.

  
FOREPERSON

KEVIN V. RYAN  
United States Attorney

  
MATTHEW A. PARRELLA  
Chief, San Jose Office

(Approved as to form: Shawna Yen)

AUSA Shawna Yen